April 10, 1987

Mr. Ernest J. Kuhlwein, Jr.
Acting Chief
Bureau of Hazardous Waste Engineering
NJ Department of Environmental Protection
401 East State Street
CN-028
Trenton, NJ 08625

Dear Mr. Kuhlwein:

In response to your letter of March 20, 1987, we have addressed the comments raised in your review of the Closure Plan and Request for Reclassification for the Plasti-Clad facility.

We hope the information enclosed satisfies your request. If you have any additional questions, please feel free to contact me at your convenience.

Sincerely yours,

Mark Matthews
Vice President

MM:cp

Enclosure

P 403 848 758

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DOMESTIC RETURN RECEIPT

RESPONSE TO NJDEP COMMENTS OF MARCH 20, 1987

1. Hydroblasting is proposed only if contamination is present at the time of closing. At the current time, no contamination is present. Contamination of the area is easily determined visually because of the obvious yellow to orange color of the waste material, therefore no sampling is proposed. Verification of the effectiveness of the clean-up would be based on no stains remaining.

   Spills can normally be cleaned up with soap and water after the liquid has been pumped off or removed with the use of an absorbent.

   The following procedure is proposed in case contamination is present at closure:

   a. Liquid waste is pumped into tank or drum as appropriate;

   b. Absorbent is spread to remove remaining free liquid;

   c. Absorbent is shoveled into 55-gallen drum and removed for offsite disposal;

   d. Stained area is scrubbed with a stiff bristle brush or a wire brush and a water/biodegradable liquid organic cleaner, if necessary;

   e. Absorbent is used to dry off the cleaned area;

   f. Clean tap water is used to rinse the area;

   g. Rinse waters are pumped off either into the tank or a 55-gallon drum;

   h. Absorbent is used to remove standing water; and

   i. Area is allowed to air dry.

   Areas still stained would be hydroblasted using a portable hydroblasting machine following standard hydroblasting procedures. The remaining liquid would be pumped into a 55-gallon drum; solids would be shoveled into a separate 55-gallon drum. Drums would be removed for off site disposal.

2. The three (3) remaining waste tanks are of fiberglass construction. The 6,000-gallon tank is a fiberglass reinforced plastic (FRP) Kabe-O-RAP storage tank constructed of Ashland Chemical's premium grade, unpigmented Hetron 197 using a C-Glass surface veil. The woven roving glass reinforced shell consists of a 5/16 inch nominal diameter Seimans-Martin Grade steel (ASTM-A-475) PVC extruded jacket.

The two (2) 990-gallon tanks are constructed of premium grade fiberglass. These Corr-Flo units have a minimum 1/2 inch thick bottom and lower side wall. The tanks have a 3/8 inch wall thickness from the lower side wall to the top of the tanks.

The three (3) tanks have been designed in accordance with ASTM standards to meet specifications of self-supporting structures for use in a chemical environment. The resins used in construction of the tank have met the C581 test for chemical resistance.

Unlike steel tanks whose shell thickness diminishes with use, fiberglass tanks are not subject to shell thinning. Fiberglass tanks, such as the Kabe-O-Rap tanks at Plasti-Clad, use steel cable to reinforce the fiberglass jacket. These unevenly distributed cables interfere with ASTM-D 4166-82, the method recommended for testing non-magnetic materials. Thus, shell thickness measurements are not normally conducted on fiberglass tanks. Fiberglass tank failures are normally due to cracking caused by accidental impacts or improper installation. The best non-destructive method available for fiberglass tanks is regular visual inspection to identify cracks and other developing structural weaknesses in the sidewalls. Visual inspections are conducted on a daily basis at the plant.

3. Engineering designs are not available for the two (2) 990-gallon storage tanks. The tanks were purchased in 1982 from the Cleveland Fluid Systems Company located in Cleveland, Ohio. They each weigh 380 pounds and are 60 inches in diameter and 90 inches high. The tanks are constructed of premium grade fiberglass with a minimum side wall thickness ranging from 1/2 inch in the lower side wall to 3/8 inch at the top of the tank.

4. The current volume of the secondary containment system is 6,300-gallons. An additional row of 8-inch cement blocks will be added to assure sufficient containment capacity. This will add 1,197 gallons of capacity to the current system. The new blocks are presently being installed.

5. Over the years the ion exchange treatment system has undergone numerous changes to improve the performance and ease of operation. Engineering designs depicting the current system in its entirety are not available. The system presently consists of an Eco-Tec, rapid flow, reciprocating wash, ion exchange unit; and, a series of ion exchange beds which separate the anions and cations from the chromic acid pickling bath waters generated in the wire coating machines.

The waste waters generated are piped from the machines to a central sump which feeds into the Eco-Tec rapid flow system where the material passes through a series of filtering beds. Cations are separated out and are recycled to the wire coating machines. Anions are retained in the beds. Once an hour the beds have to be backflushed to remove the excessive buildup of anions. Each time the unit is backflushed about 45-gallons of chromium contaminated wastewater is generated.

The backflushing occurs in the following manner: automatic control valves are activated by the timer, or the pH/conductivity sensor shutting off the flow of wastewater from the wire coating machines; at the same time a valve at the opposite end of the sand bed is automatically opened allowing clean tap water to enter the system under pressure. The reverse water flow removes the anion and other impurities from the sand beds and carries them out of the sand beds into a 1 inch C PVC schedule 80 line which runs along the wall and overhead into the 6,000-gallon storage tank. The system operates on a normal 8.5 hour a day, 5 day a week schedule, generating about 1900 to 2000 gallons of waste in that period.

6. The contingency plan developed by Plasti-Clad identifies the layout of the facility, including the location of emergency exits and entrances, and the major roads leading to the plant. A copy of the contigency plan, in addition to copies of the material safety data sheets which identify the potential hazards of the materials handled at the plant, have been submitted to the local hospital, fire department and police department. Copies of the letter of transmittal are enclosed.

7. NJAC 9.4. (g) (8) states that semi-annual drills involving employees and appropriate local authorities shall be conducted to test emergency response capabilities in accordance with the contingency plan. The contingency plan in accordance with NJAC 7:26-9.6 (f) requires that arrangements be made as appropriate based on the potential risk of the wastes handled at the facility.

   The wastes handled at the plant consists of chromium contaminated wastewater and spent chromic acid solutions. These materials are not flammable, reactive or acutely toxic. The only immediate health or environmental threat to employees would be caused if there is direct contact with the skin during a spill. However, because spills would be contained within the secondary containment system, employees would be protected from coming into contact with the wastes. Thus, no emergency type condition other than those required to remove the spill would develop. An evacuation of the building would not be necessary.

Because no health or environmental conditions requiring evacuation of the building would develop as a result of the waste type and handling practices at the facility, an exemption from the semi-annual drill requirement in NJAC 9.4 (g) 8 is requested. We would not be opposed to conducting semi-annual drills if they would provide additional protection to our employees. However, taking into account the waste types at the plant and the extremely low to non-existent probability that an emergency situation would arise out of the waste handling practices at the plant, we believe that a waiver is justified.

8. NJAC 7:26 - 9.7 (e) requires that arrangements be made with local authorities and others for emergency services as required by NJAC 7:26 - 9.6 (f).

   NJAC 7:26 - 9.6 (f) requires that arrangements be made, as appropriate, based on the types of wastes handled at the facility and the services that may be needed from emergencies that may arise from the handling of these wastes. As previously stated, the only emergency foreseen would be from an employee coming into direct contact with the chromic acid wastes. We have notified the local hospital of the types of materials handled at the plant (letter enclosed). In a telephone conversation of April 11, 1986, Miss Hayden of Jersey Shore Medical Center stated that the hospital would be capable of treating Plasti-Clad employees for burns or other injuries in their Emergency Room.

   We have also sent copies of the contingency plan to the Fire and Police Departments that are required to service the property in case of an emergency. We believe that these arrangements are appropriate considering the low hazard potential of wastes handled at the facility.

9. As requested, we have prepared a drawing which identifies the location of the emergency equipment at the plant. This drawing should be included as an addendum to the Contingency Plan.

10. NJAC 7:26 - 9.7 (h) requires that the contingency plan include an evacuation procedure where there is a possibility that evacuation could be necessary. For reasons already mentioned, we do not believe that hazardous waste operations at the site would create a situation requiring evacuation of facility personnel.

The facility consists of a one-story masonry building of approximately 17,000 square feet. There are seven (7) designated emergency exits which are clearly marked in accordance with OSHA requirements. In addition, there are four (4) overhead doors that can serve as exits for the sixteen (16) employees at the facility.

Current emergency procedures at the plant direct employees in case of a fire requiring evacuation to proceed to the closest exit away from the fire and to meet in the front parking lot for a head count.

Considering the small size of the facility and the lack of a possibility that an evacuation would be required as a result of an accident with the waste handling units, we feel that the evacuation procedure currently in effect sufficiently protects the health and welfare of our employees. Nevertheless, in an attempt to satisfy your request, we are amending the Contingency Plan to better define evacuation procedures. A copy of this amendment is enclosed for your review.

11. The emergency procedures and emergency coordinator responsibilities have also been revised in response to your request. Please replace the section in the Contingency Plan entitled "Specific Personnel Actions" with the new enclosed section.

SPECIFIC PERSONNEL ACTIONS AND PROCEDURES

The Primary Emergency Coordinator has the authority to commit the resources necessary in the event of an emergency. He is thoroughly familiar with the facility's contingency plan and has thorough knowledge of his responsibilities during various stages of an emergency.

a. Responsibilities of the Emergency Coordinator BEFORE the emergency:

1) Know the hazards associated with the various wastes handled and assess their impact in the event of an emergency. Know the procedures used to identify hazardous waste materials.

2) Know the physical layout of the site, and the operation carried out in each part of the facility.

3) Study the facility's emergency organization. Make sure that enough personnel have been given specific assignments to handle emergency situations.

4) Assure that sufficient training has been provided for all members of the emergency organization. Assure yourself that all members know and understand their assigned responsibilities before, during and after an emergency.

5) Conduct regular drills, schedule meetings and demonstrations, and add extra training whenever required.

6) Establish close cooperation with local fire departments by arranging to have their chiefs visit the site regularly. Discuss potential hazards - quick and easy access to all areas - how to assure prompt warning when necessary - how to coordinate your forces with those of fire department personnel.

7) Coordinate fire fighting training programs with the local fire departments.

b. Responsibilities of Emergency Coordinator DURING the emergency:

1) Double check your emergency organization. Your primary job is to see that <u>all</u> members of your emergency unit are in their proper place, and performing as they have been trained.

2) Determine if the assistance of public fire departments or other organizations is needed, and if they have been notified.

3) Make certain that outside assistance can gain access to the area of trouble, and brief the person in charge as to the extent of the emergency, and any hazards which may be pertinent to this incident.

4) Identify the character, source, amount and areal extent of any released materials. Procedures to follow include:

a) Identify the area in which the release is located such as the tank or loading storage area.

b) Locate the exact source of the released materials within the specified area.

c) Characterize released materials based on site records.

d) Visually estimate the amount of released material based on the capacity of the sources less the contents of sources still contained.

e) Visually estimate areal extent of released material based on square footage of ground cover, capacity of bermed area surrounding spill areas, and depth of the spill.

f) Solicit information from individiuals on-site who may have specific knowledge relating to the released material.

c. Responsibilities of Emergency Coordinator AFTER the emergency:

1) Make certain that there are no aspects of the situation which have been overlooked. This includes an immediate and thorough examination of the entire emergency area.

2) Intensify clean-up and salvage work. Use all available personnel to mop up, clean-up equipment, and generally restore order. When a fire has been contained, keep a close watch to prevent reignition and development of additional emergency situations.

3) Put emergency equipment and materials back into a state of readiness. Have supplies which have been used in this emergency restocked, and ensure that your organization is ready for any new situation which might develop.

4) Advise appropriate authorities when the emergency is over.

5) Determine necessary actions to complete clean-up. Make certain that necessary safety precautions are being taken.

6) Conduct a thorough investigation in order to determine possible causes of the incident.

7) Take proper steps to prevent the possible recurrence of an emergency situation from these suspected causes.

8) Plans should be revised to deal with emergencies in a more effective way, if the method used did not prove fully efficient.

Implementation of Contingency Plan

The decision to implement the contingency plan is the responsibility of the Emergency Coordinator. The extent of the emergency, and whether or not imminent or actual danger could threaten human health or the environment dictates the extent of the implementation. The responsible coordinator will implement full or partial segments of the contingency plan based on the situation at the site during the fire and/or explosion and spill or material release. The following situations will be considered to determine if the situations pose a serious threat to human health or the environment.

1. Fire and/or explosion:

   a. The fire spreads and could possibly ignite materials at other locations on-site, or could cause heat-induced explosions.

   b. The fire could possibly spread to off-site areas.

   c. Use of water and/or water and chemical fire suppressant could result in contaminated runoff.

   d. An imminent danger exists that an explosion could occur.

2. Spill or material release:

   a. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.

   b. The spill could cause the release of toxic liquid or fumes.

   c. The spill can be contained on-site, but potential exists for ground-water contamination.

d. The spill cannot be contained on-site, resulting in off-site soil contamination and/or ground or surface water contamination.

e. The spill can reach the sewer system, thus creating an explosive atmosphere.

The procedures to be followed in the event of an emergency situation are specified in following subsection.

Emergency Procedures

Notification

In the event of an emergency situation, the Emergency Coordinator will be notified first, and subsequently all other facility management personnel. The facility is equipped with an emergency communication system consisting of fire alarm systems, two-way radios, and telephones for internal and external communications. These telephones are located in the administrative and control buildings, and at the facility entrance. Fire alarm boxes are located in each building.

Police and fire departments will be notified if their assistance is required. The site Emergency Coordinator is responsible for the notification to the NJDEP and the USEPA Emergency Response Team for all situations that require notification and/or assistance.

Identification of Hazardous Waste

Upon arrival at the site, the Emergency Coordinator will immediately determine the extent of emergency situation. By utilizing visual inspection and analysis, the coordinator will identify the character, danger, source and urgency of the situation. The following procedures will be utilized in the event of an emergency situation in order to identify the hazardous waste involved.

Characteristics of Waste

Since only two types of wastestreams are handled at the facility, and both waste types are stored in separate areas. The exact characteristics of the waste can be readily identified by the location of the emergency situation.

Exact Source

As described above, both waste types are stored in two separate areas. By visual observation, any employee can clearly identify the exact source of the problems in the event of an emergency situation.

Amount

Accurate records, in the form of tank inventory, of the stored hazardous wastes are kept on site. Should an emergency involve the hazardous waste, an assessment of the volume of material can be easily made by comparing immediate counts to daily inventory records.

Aerial Extent of Release

Aerial releases of vapor/fumes generating from the hazardous waste stored at the site will not occur.

Extent of Hazardous Conditions

The immediate assessment of any possible hazards is the primary responsibility of the Emergency Coordinator and/or the designated alternate on-site coordinator. Evaluation of the extent of an emergency as far as hazardous wastes involved, environmental impact, and potential human health hazards, etc. is essential to ensure proper procedures, and protection of emergency personnel in treating the incident.

In the event of an emergency situation, the Emergency Coordinator will immediately be notifed of type, quantity, and extent of the situation and wastes involved. The Emergency Coordinator will determine which agencies will be notified. The immediate assessment report could possibly trigger the need for an evacuation.

Evacuation of the site will be based on the following situations:

1) Fire that could spread beyond the initially involved area.

2) Excessive heat that could cause a dangerous explosion.

Emergency Control Procedures

At the facility potential or probable accidents fall into two classifications: (1) fire; and, (2) spill or release of hazardous wastes.

In the event of an emergency situation, the plant personnel have the primary responsibility to attempt to control the situation by the most effective means to the situation and least dangerous to personnel. The emergency response action to be followed during a fire and/or explosion and a spill or release of waste are summarized in Tables 3-1 and 3-2, respectively.

Fire and/or Explosion

The waste storage areas are easily accessible to fire fighting or other emergency vehicles and equipment.

Any evidence of smoke, sparks, smouldering, or suspicious odors is to be investigated immediately and brought to the Shift Supervisor's attention.

If the fire is of a minor nature, and can be extinguished with a portable fire extinguisher, the operator should attempt to do so. If available, another operator should stand by to direct the Shift Supervisor to the scene of the fire. If the investigation reveals the source to be a fire not of minor nature, the local fire department will be called.

TABLE 3-1

EMERGENCY RESPONSE ACTIONS
TO FIRE/EXPLOSION

Immediate Short-Term Remedial Measures	Problem Definition Baseline Data Acquisition and Environmental Impact Assessments	Prevention of Recurrence, Desig of Remedial Measur and Long-Term Monitoring
Evacuate immediate area of all personnel excluding emergency personnel.	Estimate the amount and area extent of the hazard through visual inspection; based on knowledge of specific containment area(s) involved (square feet).	Initiate cleanup procedures; bulk runoff from fire-fighting and pump into waste storage tank; con-tainerize residua and any sorbent materials used an store for off-sit disposal.
Provide adequate pro-tection (i.e., breathing apparatus, antiexposure suits) for emergency personnel as necessary.	Determine the impact of the emergency situation on the environment based on materials involved (both initial and remedial sources of contamination).	Thoroughly examin the entire emerge area and all equi ment which may ha been involved in incident; contami-nated equipment w be cleaned using high pressure was of trisodium phos-phate and steam.
Contain the hazard by isolating the source; remove potentially ignitable or explosive materials from the immediate area.		
Characterize the fuel source; provide appro-priate means of ex-tinguishing the flames (involves visual inspection, review of site records and if necessary, chemical analysis).		Monitor the area immediately surrounding the incident; keep wa for any new devel ments resulting f the emergency sit tion (recurring fires, leaks, etc. This is a supple-mentary inspectio to the regular we ly inspections of the area.
Assess potential hazards to human health and the environment (fumes, gaseous vapors) and notify local authorities, if necessary.		

TABLE 3-2

EMERGENCY RESPONSE ACTIONS
TO SPILL OR RELEASE OF WASTE

Immediate Short-Term Remedial Measures	Problem Definition Baseline Data Acquisition and Environmental Impact Assessments	Prevention of Recurrence, Design of Remedial Measure and Long-Term Monitoring
Evacuate immediate area of all personnel excluding emergency personnel.	Estimate the amount and area extent of the hazard through visual inspection based on knowledge of specific containment areas and/or area involved (sq. ft.).	Initiate cleanup p cedures; collect spilled materials; this may be accomplished through th use of pumps in la episodes or use of absorbing agents s as "Speedi-Dry" co pounds in spill situations.
Provide adequate protection (i.e., anti-exposure suits, etc.) for emergency personnel as necessary.	Determine the impact of the incident on the environment based on materials involved (surface water, soils).	
Contain the spill or release by means of temporary barriers (berms, dikes, etc.).		Remove all absorbi and treating agent from the spill sit by means of collec tion in drums; the will be delivered off-site disposal site.
Characterize the release by means of visual inspection, review of site records, and if necessary, by chemical analysis.		If necessary, exca vate contaminated soils from the spi area (excavate unt contamination pose no imminent danger the ground water, etc.; case by case basis).
Assess the potential hazards to human health and the environment and notify local authorities as necessary.		

Should a fire occur in the waste storage area, company employees will concentrate on containing the blaze and preventing its spread until the local fire department arrives at the scene. The following action wil be taken in the affected area immediately:

- All excess personnel will be instructed to leave the area by moving upwind of the hazardous location.
- Someone will be designated to institute roll call and account for all personnel on duty.
- A person will be appointed to provide an unobstructed route for emergency vehicles and equipment, and direct them to emergency areas.
- All electric power to the area will be immediately disconnected.

Unless evacuation is necessary, all personnel not affected by the emergency will remain in their respective work areas and continue their normal activities. All contract personnel or visitors on-site will be required to leave the area and report to the office. No employee is permitted to re-enter a hazardous area unless he/she is equipped with the proper and appropriate safety equipment and an all-clear signal has been given.

The Fire Brigade Chief of the local fire department will have the following responsibilities DURING the emergency:

1. The primary responsibility is to direct the members of the fire company, seeing that all are in place and performing as they have been trained to do.
2. Be alert to developments in the situation as the emergency progresses, directing the efforts of the emergency crew as necessary to cope with these developments.
3. Keep the Emergency Coordinator, or his alternate, fully informed of the situation, recommending a call for additional assistance, if needed.
4. Coordinate the activities of the fire brigade with that of another fire company through the person in charge to make the most effective use of manpower and equipment.

Fire fighting will not be permitted if risk of injury to the personnel is involved. Early containment of fires can decrease damage and spread. Employees are required to fight the fires they feel they can contain. All fires are reported to the local fire department.

The following steps will be taken AFTER the emergency:

1. Procure supplies and materials necessary to replenish stocks in the emergency supply that have been used during the emergency.

2. Decontaminate all equipment, including off-site equipment which, was in use during the emergency, if necessary.

3. Check over emergency equipment which was in use during the emergency to ascertain that it is in good condition, cleaned, and ready for another emergency should one arise.

Spill or Material Release

The following procedure addresses general actions to be taken by plant personnel in the event of a spill or the imminent possibility of a spill of hazardous wastes.

1. Upon detection of a spill, notify the Emergency Coordinator (Shift Supervisor). The Emergency Coordinator will then immediately proceed to secure the area, keeping personnel and motor vehicles away from the area.

2. The following information will immediately be collected by the Emergency Coordinator:

   - the exact type of waste spilled or released
   - the location of the spill or release
   - the direction of winds
   - the direction in which the liquids or vapors are travelling
   - the number and extent of injuries
   - the extent of damage to the site

3. Arrangements of necessary personnel and equipment to initiate containment and cleanup and/or contacting a cleanup contractor. The information obtained during step 2 will assist the Coordinator to determine if the incident can be handled and safely managed by in-plant personnel or if there is a need to deploy off-site assistance.

4. Notification of plant management as the incident requires.

5. Cleaning up of the spill and disposing of material as necessary.

6. Removal of contaminated soil and storage in drums for disposal as hazardous waste.

The procedures specified below will be followed during a spill:

1. Evacuate the area, sound plant alarm, and notify the Emergency Coordinator at once.

2. Valve off source of spill if possible.

3. Personnel involved in cleanup shall use goggles, rubber suite, gloves, and boots. "Scott Air Paks" shall be made available for use as needed. Phenol will cause severe burns to skin upon exposure. Protection must be maintained at all times.

4. Pump waste back into the tank or store in drums. Add water to dike as necessary to help in keeping the wastes liquified.

5. Wash the dike.

6. Clean equipment used during the cleanup.

Storage and Treatment of Released Material

The Emergency Coordinator is responsible for the proper containment and labelling of all contaminated materials and wastes generated during the emergency. The Coordinator will also make arrangements for the storage and off-site disposal of all the containers and contaminated materials generated during the emergency situation.

In the event of release of hazardous material, the Emergency Coordinator will employ the following procedures to contain, treat, cleanup, and decontaminate the area:

- immediately stop the operation involved
- contain and collect all wastes generated
- for solid wastes released from containers:
  - flood the contained area with a liquid (e.g., water) suitable to remove any or all solids that may adhere to the paved surface of the storage area
  - pump the contaminated solution into containers and label as appropriate.
  - repeat as necessary

- for liquid spills from containers/tank:

  - after pumping all free standing liquid, cover the area with an absorbent material or absorbent pads to remove small deposits

  - when all liquids are visibly removed, flush the area several times with small amounts of water in order to remove as much of the residual contaminant as possible. Pump the flushing into a container and repeat as often as necessary

Incompatible Wastes

No incompatible wastes are generated or stored at the site. The Emergency Coordinator will ensure that no incompatible substances are stored near or mixed with the released or spilled material during cleanup procedures.

Post-Emergency Equipment Maintenance

Following an emergency situation, all emergency equipment used will be returned to their storage location. Disposable personal safety equipment will be stored in a container, labelled to reflect the contaminant or situation, and held for off-site disposal. Maintenance personnel are assigned to clean and service the used emergency equipment. The Emergency Coordinator is responsible to inspect and release the equipment before it is replaced for re-use. Outside services will be called whenever deemed necessary, such as to service fire extinguishers and breathing canisters, etc.

Evacuation

The necessity to evacuate the facility is an extremely remote possibility. However, in the event of this unlikely possibility, the evacuation procedures followed by the routes identified in Figure 1 would be utilized.

If the Emergency Coordinator, or his alternate, determines that the facility has had a fire which would impact on off-site receptors, the following will be notified:

1. Appropriate local authorities including:

    a. Fire Department
    b. Police Department
    c. Civil Defense (Disaster Preparedness)

2. Area Hospitals

Reporting

Any time there is a fire/explosion, there is a possibility for personal injury or property damage. Thorough investigation of each of these occurrences to identify the cause and to develop appropriate preventive measures will prevent or greatly minimize the recurrence of the incident.

As soon as possible after an emergency situation has been cleared up, all employees involved in the accident, or who were working in the vicinity, will be questioned individually to learn all available facts.

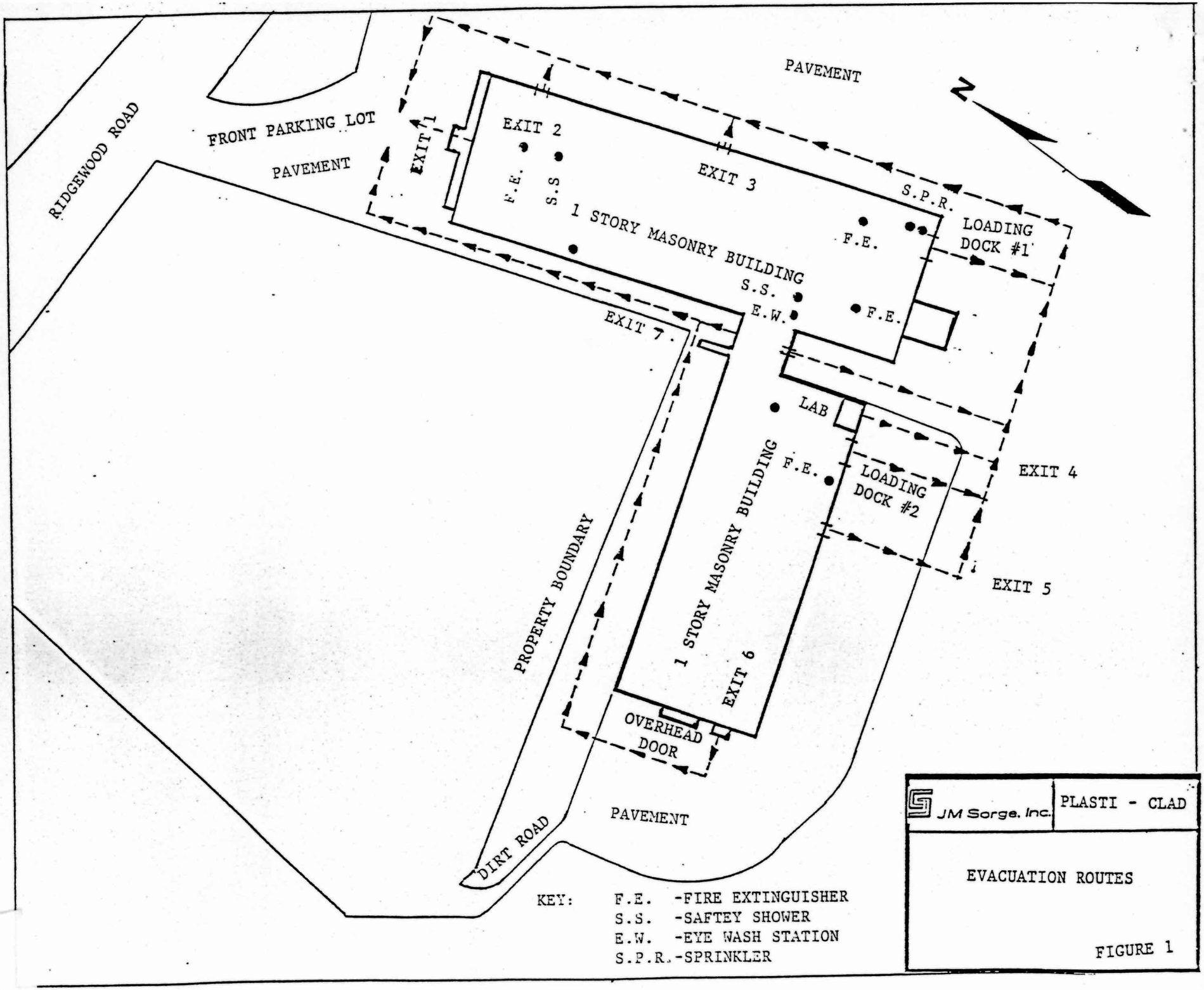
In the event of an emergency situation, the required reports will be submitted to both NJDEP and USEPA Regional Administrator within fifteen (15) days of the incident occurrence. The report, at the minimum, should include the following:

1. Date, time and type of incident.
2. Type and quantity of waste(s) involved.
3. The extent of injuries and property damage, if any.
4. Hazard assessment to human health or environment.
5. Assessment of the scope and magnitude of the problem, including causes of the accident.
6. The corrective actions and/or countermeasures taken, including the quantity and disposition of recovered material from the cleanup activities.
7. A description of any equipment repairs and/or replacements.
8. Additional measures taken or proposed to minimize the possibility of recurrence.
9. Implementation schedule for proposed measures to eliminate the problem.

Plan Amendments

The main objective of the Contingency Plan is to outline countermeasures and remedial actions to be taken in the event of the occurrence of extraordinary circumstances involving the operations at the site. The remedial courses of action described in the plan have been developed to minimize the potential for any negative environmental impacts. It should be stressed that specific design and operational criteria have been implemented for the site operations for the purpose of preventing or minimizing the impact of the circumstances described herein.

If the measures prescribed in this plan fail during an emergency, those factors which were inadequate will be revised as necessary. In addition, the Contingency Plan will be amended whenever the list of emergency coordinators or the emergency equipment list changes. The plan will be reviewed and amended if necessary whenever the facility permit or applicable regulations are revised, or the facility is changed in such a way as to increase the potential for creation of an emergency situation.


RIDGEWOOD ROAD
FRONT PARKING LOT
PAVEMENT
PAVEMENT
N
EXIT 1
EXIT 2
EXIT 3
F.E.
S.S.
1 STORY MASONRY BUILDING
S.P.R.
LOADING DOCK #1
F.E.
S.S.
E.W.
F.E.
EXIT 7
LAB
F.E.
LOADING DOCK #2
EXIT 4
EXIT 5
PROPERTY BOUNDARY
1 STORY MASONRY BUILDING
EXIT 6
OVERHEAD DOOR
DIRT ROAD
PAVEMENT
KEY: F.E. -FIRE EXTINGUISHER
S.S. -SAFTEY SHOWER
E.W. -EYE WASH STATION
S.P.R.-SPRINKLER
JM Sorge. Inc.
PLASTI - CLAD
EVACUATION ROUTES
FIGURE 1

Plasti-Clad METAL PRODUCTS, Inc.

LING ADDRESS:
O. BOX 121
AN, N.J. 08736-0121

(201) 449-2665

PLANT:
RIDGEWOOD ROAD
WALL TOWNSHIP, N. J.

April 23, 1986

Wall Township Police
P.O. Box 1168
Wall Twp., NJ 07719

ATTN: Sgt. James Leddy

Dear Sgt. Leddy:

Please find enclosed two copies of our Contingency Plan to be used in an emergency. Kindly keep these in your files in the event that we might have a fire or other disaster. Please feel free to call me anytime at 449-2665 or 899-5394 if you have any questions regarding this plan.

Truly yours,

Mark Matthews

Mark Matthews
Vice President &
Emergency Coordinator

MM:cm

Enc.

Plasti-Clad METAL PRODUCTS, Inc.

MAILING ADDRESS:
P. O. BOX 121
NASQUAN, N.J. 08736-0121

(201) 449-2665

PLANT:
RIDGEWOOD ROAD
WALL TOWNSHIP, N. J.

April 24, 1986

South Wall Fire Co.
2605 Atlantic Ave.
Allenwood, NJ 08720

ATTN: Chief Eric Goetz

RE: Semi-Annual Inspections

Dear Chief Goetz:

Would you kindly contact me at 201-449-2665 to make arrangements to have a fire inspection done semi-annually.

Truly yours,

Mark Matthews
Vice President &
Emergency Coordinator

MM:cm

Plasti-Clad METAL PRODUCTS, Inc.

MAILING ADDRESS:
P. O. BOX 121
MANASQUAN, N.J. 08736-0121

(201) 449-2665

PLANT:
RIDGEWOOD ROAD
WALL TOWNSHIP, N. J.

April 11, 1986

Jersey Shore Medical Center
1945 Corlies Avenue
Neptune, NJ 07753

ATTN. Mr. D'Andrea
Safety Director

Dear Mr. D'Andrea:

In speaking with your Miss Hayden today, we would like to apprise you and put you on notice that we here at Plasti-Clad Metal Products currently use the following hazardous substances:

1. Sulphuric Acid - 66 degrees Be
2. Sodium Hydroxide - 50%
3. Chromic Acid - Solution & Solid

We have enclosed the Material Safety Data Sheets for these materials as well as some guidelines copied from the Department of Transportation Guidebook for Hazardous Materials Incidents.

Would you kindly have your office transfer this information down to the appropriate departments in the hospital system for their files. If any questions do arise, I can be contacted at work at 201-449-2665 or at home at 201-899-5394. Thanking you once again.

Truly yours,

Mark Matthews

Mark Matthews
Vice President &
Emergency Coordinator

MM:cm

Enc.

Plasti-Clad METAL PRODUCTS, Inc.

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(201) 449-2665

PLANT:
RIDGEWOOD ROAD
WALL TOWNSHIP, N. J.

April 23, 1986

South Wall Fire Co.
2605 Atlantic Ave.
Allenwood, NJ 08720

ATTN: Chief Eric Goetz

Dear Chief Goetz:

Please find enclosed a copy of our Contingency Plan in the event of a fire. Kindly file this so your people will have it in the event of a fire or other disaster. Please feel free to call me at 201-449-2665 or 201-899-5394 if you have any questions.

Truly yours,

Mark Matthews
Vice President &
Emergency Coordinator

MM:cm

Enc.